

Via Electronic and Certified Mail

August 15, 2013

Mr. Stephen Tzhone, Superfund Remedial Project Manager
Superfund AR/LA Enforcement Section (6SF-RA)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

**Subject: Dioxin Reassessment - Conceptual Site Model
 Arkwood, Inc. Site, Omaha, Arkansas**

Dear Mr. Tzhone:

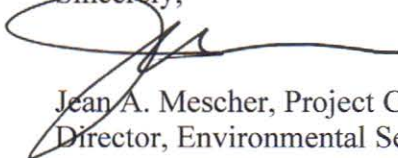
In response to your letter dated May 9, 2013, please find the enclosed letter report presenting an updated Conceptual Site Model (CSM) for the Arkwood, Inc. Superfund Site. As requested, the CSM sets the foundation for the potential sources, exposure pathways and receptors for dioxin. Decision Units are proposed for potential additional sampling. Once approval of the CSM is received from the USEPA, a work plan for additional sampling will be submitted for review and agency approval.

As a related item, please note that a Deed Notice for the Site was filed on August 30, 2010. The Deed Notice is not in compliance with the requirements of the Record of Decision (ROD) for the Site, contains inaccurate metes and bounds, and does not protect the Site remedy. The ROD requires that the Site future use be restricted to industrial uses. The metes and bounds need to be corrected. The Deed Notice as written does not protect the Site remedy. In particular, it does not require maintaining the integrity of the soil cap and drainage ditches which are both integral components of the Site remedy. It is our understanding that an appropriate deed restriction will be filed for the Site.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this letter and enclosure, please do not hesitate to contact me at (608) 848-4134.

Sincerely,



Jean A. Mescher, Project Coordinator
Director, Environmental Services

Enclosure

Copy:

- Mark Moix, ADEQ*
- EPA Assistant Regional Counsel (6C-WA)* (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E)* (w/o enclosure)

*** CERTIFIED MAIL**